

# EXHIBIT N

**Eaton, Ellie (SF)**

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**From:** Eaton, Ellie (SF)  
**Sent:** Friday, August 21, 2020 12:49  
**To:** SBloyd@rgrdlaw.com; Willow Radcliffe; Chris Wood; Dennis Herman; Jason Forge; CLyons@rgrdlaw.com; SMorris@rgrdlaw.com; KennyB@rgrdlaw.com  
**Cc:** Glennon, Brian (LA); Schindler, David (LA); Tomkowiak, Sarah (DC); Pettis, Eric (LA); Whitworth, Morgan (Bay Area); Grant, Meryn (LA); TMcGee@rwjplc.com; sriley@rwjplc.com  
**Subject:** Grae v. Corrections Corporation of America, No. 3:16-cv-02267 (M.D. Tenn)  
**Attachments:** 2020.08.21 David Garfinkle Verification.pdf; 2020.08.21 Damon Hininger Verification.pdf; 2020.08.21 Harley Lappin Verification.pdf

Dear Counsel,

Please see attached Verifications for Defendants' Responses to Plaintiffs' Second Set of Interrogatories from:

1. Damon Hininger
2. Harley Lappin
3. David Garfinkle

Best,  
Ellie

**Ellie Eaton**  
Paralegal

**LATHAM & WATKINS LLP**  
505 Montgomery Street | Suite 2000 | San Francisco, CA 94111-6538  
D: +1.415.395.8811

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually  
and on Behalf of All Others Similarly  
Situated,

Plaintiff,

vs.

CORRECTIONS CORPORATION OF  
AMERICA, et al.,

Defendants.

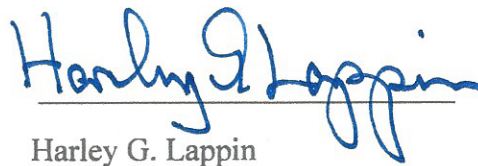
Civil Action No. 3:16-cv-02267

Honorable Aleta A. Trauger  
Magistrate Judge Jeffery S. Frensley

VERIFICATION FOR DEFENDANTS'  
RESPONSES TO PLAINTIFFS' SECOND SET  
OF INTERROGATORIES

I, Harley G. Lappin, based upon my personal knowledge, verify under penalty of perjury that Defendants' Responses to Plaintiffs' Second Set of Interrogatories as served on June 24, 2020 are true and correct.

Executed this 21<sup>st</sup> day of August 2020.

  
Harley G. Lappin

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually  
and on Behalf of All Others Similarly  
Situating,

Plaintiff,

vs.

CORRECTIONS CORPORATION OF  
AMERICA, et al.,

Defendants.

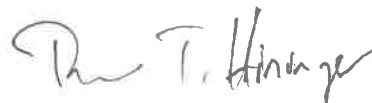
Civil Action No. 3:16-cv-02267

Honorable Aleta A. Trauger  
Magistrate Judge Jeffery S. Frensley

VERIFICATION FOR DEFENDANTS'  
RESPONSES TO PLAINTIFFS' SECOND SET  
OF INTERROGATORIES

I, Damon T. Hininger, based upon my personal knowledge, verify under penalty of perjury that Defendants' Responses to Plaintiffs' Second Set of Interrogatories as served on June 24, 2020 are true and correct.

Executed this 21<sup>st</sup> day of August 2020.



Damon T. Hininger

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually  
and on Behalf of All Others Similarly  
Situating,

Plaintiff,

vs.

CORRECTIONS CORPORATION OF  
AMERICA, et al.,

Defendants.

Civil Action No. 3:16-cv-02267

Honorable Aleta A. Trauger  
Magistrate Judge Jeffery S. Frensley

VERIFICATION FOR DEFENDANTS'  
RESPONSES TO PLAINTIFFS' SECOND SET  
OF INTERROGATORIES

I, David M. Garfinkle, based upon my personal knowledge, verify under penalty of perjury that Defendants' Responses to Plaintiffs' Second Set of Interrogatories as served on June 24, 2020 are true and correct.

Executed this \_\_\_\_\_ day of August 2020.

David M.  
Garfinkle

Digitally signed by David M. Garfinkle  
DN: cn=David M. Garfinkle, o=CoreCivic,  
ou=Chief Financial Officer,  
email=david.garfinkle@corecivic.com, c=US  
Date: 2020.08.21 08:34:10 -05'00'

David M. Garfinkle

## Eaton, Ellie (SF)

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**From:** Eaton, Ellie (SF)  
**Sent:** Friday, August 21, 2020 15:28  
**To:** #C-M CORECIVIC SEC LIT - LW TEAM  
**Subject:** FW: Grae v. Corrections Corporation of America, No. 3:16-cv-02267 (M.D. Tenn)  
**Attachments:** 2020.08.21 Todd Mullenger Verification.pdf

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**From:** Eaton, Ellie (SF)  
**Sent:** Friday, August 21, 2020 15:27  
**To:** 'SBloyd@rgrdlaw.com' <SBloyd@rgrdlaw.com>; 'Willow Radcliffe' <Willowr@rgrdlaw.com>; 'Chris Wood' <CWood@rgrdlaw.com>; 'Dennis Herman' <DennisH@rgrdlaw.com>; 'Jason Forge' <JForge@rgrdlaw.com>; 'CLyons@rgrdlaw.com' <CLyons@rgrdlaw.com>; 'SMorris@rgrdlaw.com' <SMorris@rgrdlaw.com>; 'KennyB@rgrdlaw.com' <KennyB@rgrdlaw.com>  
**Cc:** Glennon, Brian (LA) <Brian.Glennon@lw.com>; Schindler, David (LA) <David.Schindler@lw.com>; Tomkowiak, Sarah (DC) <Sarah.Tomkowiak@lw.com>; Pettis, Eric (LA) <Eric.Pettis@lw.com>; Whitworth, Morgan (Bay Area) <Morgan.Whitworth@lw.com>; Grant, Meryn (LA) <Meryn.Grant@lw.com>; 'TMcGee@rwjplc.com' <TMcGee@rwjplc.com>; 'sriley@rwjplc.com' <sriley@rwjplc.com>  
**Subject:** Grae v. Corrections Corporation of America, No. 3:16-cv-02267 (M.D. Tenn)

Dear Counsel,

Please see attached Verification for Defendants' Responses to Plaintiffs' Second Set of Interrogatories from Todd Mullenger.

Best,  
Ellie

**Ellie Eaton**  
Paralegal

**LATHAM & WATKINS LLP**  
505 Montgomery Street | Suite 2000 | San Francisco, CA 94111-6538  
D: +1.415.395.8811

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually  
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Civil Action No. 3:16-cv-02267

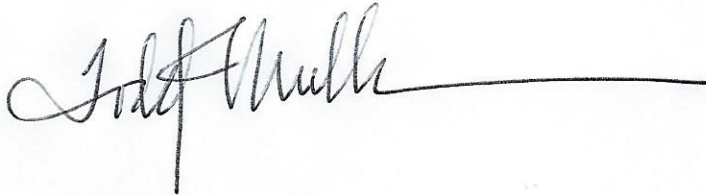
Honorable Aleta A. Trauger  
Magistrate Judge Jeffery S. Frensley

VERIFICATION FOR DEFENDANTS'  
RESPONSES TO PLAINTIFFS' SECOND SET  
OF INTERROGATORIES

I, Todd J. Mullenger, based upon my personal knowledge, verify under penalty of perjury that Defendants' Responses to Plaintiffs' Second Set of Interrogatories as served on June 24, 2020 are true and correct.

Executed this 21 day of August 2020.

Todd J. Mullenger

A handwritten signature in black ink, appearing to read "Todd J. Mullenger", followed by a long horizontal line extending to the right.